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22 Attorneys for the United States

23 IN THE UNITED STATES DISTRICT COURT
24 FOR THE NORTHERN MARIANA ISLANDS

25 JOHN K. BALDWIN,

26 Case No.: CV08-0024

27 Plaintiff,

28 vs.

29 **STIPULATION FOR EXTENSION
30 OF TIME**

31 UNITED STATES OF AMERICA,

32 Defendant.

33 WHEREAS, on May 30, 2008, Plaintiff, John K. Baldwin, filed his Original Complaint
34 and Application for Injunctive Relief along with an Emergency Motion for Temporary
35 Restraining Order;

1 WHEREAS, the United States of America's response to the original Complaint is due on
2 July 29, 2008;

3 WHEREAS, due to the complexity of the case, the United States requests additional time
4 to respond to the Original Complaint;

5 WHEREAS, the parties agree that, in light of the substantive nature of the case, an Order
6 Granting Extension of Time which grants the United States sixty (60) days from July 29, 2008 to
7 file its response is appropriate;

8 NOW, THEREFORE, in light of the foregoing recitals, the parties, through their
9 respective undersigned counsel, stipulate to continue the case and jointly request the Court to
10 enter an Order Granting Extension of Time.

11 SO STIPULATED: this 25th day of July, 2008.

12 O'CONNOR BERMAN DOTT & BANES

13 /s/ Gregory J. Koebel
14 GREGORY J. KOEBEL
15 ROBERT J. O'CONNOR
Attorneys for Plaintiff

16 SO STIPULATED: this 25th day of July, 2008.

17 JEREMY HENDON
18 Trial Attorney, Tax Division
U.S. Department of Justice

19 LEONARDO M. RAPADAS
20 United States Attorney
Districts of Guam & NMI

21 /s/ Jessica F. Cruz
22 JESSICA F. CRUZ
23 Assistant U.S. Attorney
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24 Assistant U.S. Attorney
Attorneys for the Defendant